

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
V.)	
)	
ARTHUR GIANELLI,)	
MARYANN GIANELLI,)	
FRANK IACOBONI,)	Criminal No: 05-10003-NMG
PHILIP PUOPOLO,)	
DENNIS ALBERTELLI,)	
RANDY ALBERTELLI,)	
GISELE ALBERTELLI,)	
SALVATORE RAMASCI,)	
RAFIA FEGHI, and)	
JOSEPH YERARDI.)	
)	

MOTION FOR LEAVE TO FILE MEMORANDUM
IN EXCESS OF TWENTY PAGES

Defendants respectfully request that this Honorable Court grant them leave to file a memorandum of law in support of their motion to suppress fruits of wiretaps. A longer memorandum is required in this case because the Magistrate Judge assigned to this case requested that Defendants file a joint motion; the motion concerns a wiretap investigation spanning more than two years; Defendants challenge the lawfulness of twenty-five wiretap warrants in two separate counties; and discovery in this case was voluminous. Defendants anticipate that their collective brief will total approximately 80 pages.

Respectfully submitted,
Defendant, Arthur Gianelli,
By his attorney,

/s/ Patricia A. DeJuneas

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Respectfully submitted,
Defendant, Philip Puopolo,
By his attorney,

/s/ Robert M. Goldstein
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Respectfully submitted,
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By his attorney,

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Respectfully submitted,
Defendant, Mary Ann Gianelli
By her attorney,

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Respectfully submitted,
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By her attorney,

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Respectfully submitted,
Defendant, Rafia Feghi,
By his attorney,

/s/ Walter B. Prince

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Respectfully submitted,
Defendant, Randy Albertelli,
By his attorneys,

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Respectfully submitted,
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By his attorney

/s/ Deborah DelVecchio
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Respectfully submitted,
Defendant, Dennis Albertelli,

By his attorney

/s/ Charles W. Rankin
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Respectfully submitted,
Defendant, Salvatore Ramasci,
By his attorney,

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Dated: March 19, 2008

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 19th day of March, 2008.

/s/ Patricia A. DeJuneas
Patricia A. DeJuneas, Esquire